

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Kevin Meehan,

Plaintiff,

v.

VIPKID aka BEIJING DAMI
TECHNOLOGY CO., LTD., VIPKID HK
LTD. aka VIPKID, BEIJING DAMI FUTURE
TECHNOLOGY CO. LTD. aka VIPKID,
TENCENT HOLDINGS LTD. aka
TENCENT, TENCENT AMERICA L.L.C.
aka TENCENT, TENCENT CLOUD L.L.C.,
SEQUOIA CAPITAL OPERATIONS L.L.C.
aka SEQUOIA CAPITAL, CHINA
RENAISSANCE HOLDINGS LTD. Aka
CHINA RENAISSANCE, and VIPKID
INTERNATIONAL, INC. aka VIPKIDS
INTERNATIONAL, INC. aka VIPKID.,

Defendants.

Case No. 2:20-cv-06370-JS-AKT

**DEFENDANT SEQUOIA CAPITAL OPERATIONS, LLC'S NOTICE OF MOTION AND
MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT PURSUANT
TO FEDERAL RULES 12(B)(2) AND 12(B)(6)**

PLEASE TAKE NOTICE that Defendant Sequoia Capital Operations, LLC, (“Sequoia Capital”) through its attorneys, Quinn Emanuel Urquhart & Sullivan, LLP, will move this Court before the Honorable Joanna Seybert, United States District Judge for the Eastern District of New York, in Courtroom 1030 at the Alfonse M. D’Amato Federal Building, United States District Court, 100 Federal Plaza, Central Islip, NY 11722, on a date and time to be determined by the Court, for an order dismissing with prejudice all claims brought against it in Plaintiff Kevin Meehan’s First Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and for any other relief as the Court deems just and proper.

Sequoia Capital bases this Motion on the accompanying Memorandum of Law in Support of Sequoia Capital Operations, LLC’s Motion to Dismiss the First Amended Complaint and the Declaration of Robin Chang in Support of Sequoia Capital Operations, LLC’s Motion to Dismiss the First Amended Complaint, and any other materials or oral argument that the Court may properly consider in connection with this Motion.

DATED: January 21, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Harry A. Olivar, Jr.

Harry A. Olivar, Jr. (NY Bar No. 2430478)
harryolivar@quinnemanuel.com
Quinn Emanuel Urquhart & Sullivan, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000

Attorneys for Defendant
Sequoia Capital Operations, LLC